

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF)
AMERICA,)
)
Plaintiff,) Civil Action No.: 3:22-cv-00512-KM
)
v.)
)
PETER J. BADDICK, III.,)
DO.)
)
Defendant.)

DEFENDANT'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Defendant Peter J. Baddick, III., D.O. (“Defendant”), by and through his undersigned counsel, hereby requests that the Court enlarge the time within which Defendant has to respond to the Complaint in the above-captioned action. In support of this Motion, Defendant avers as follows:

1. On April 6, 2022, the U.S. government instituted this action by filing a Complaint.
2. Defendant waived service of summons on or about May 16, 2022, making Defendant’s pleading response date June 13, 2022.
3. Frier & Levitt, LLC has only been recently retained to represent Defendant in the instant matter. As such, counsel respectfully requests additional time to become familiar with the case and to prepare an adequate response to the

allegations contained within the Complaint.

4. On June 6, 2022, counsel for Defendant sought the concurrence of Assistant U.S. Attorney D. Brian Simpson, with respect to the instant Motion for Enlargement of Time.

5. On June 8, 20202, Mr. Simpson informed Defendant's counsel that the government does not oppose the instant Motion.

WHEREFORE, Defendant respectfully requests that the Court enlarge the time for him to respond to the Complaint until August 12, 2022.

Dated: June 9, 2022

Respectfully submitted,

/s/ Conor R. McCabe
Conor R. McCabe (PA 327976)
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Attorney for Defendant

CERTIFICATE OF CONCURRENCE

I hereby certify that counsel for Defendant Dr. Baddick has conferred with counsel for the U.S. government, who concurs with this request.

Dated: June 9, 2022

/s/ Conor R. McCabe
Conor R. McCabe

CERTIFICATE OF SERVICE

I hereby certify that on this day, a true and correct copy of the foregoing has been served on all parties of record through the Court's CM/ECF system.

Dated: June 9, 2022

/s/ Conor R. McCabe
Conor R. McCabe